UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

JOINT STATUS REPORT

The parties have exchanged written discovery demands and responses, and with limited exception described below, written discovery has been completed for several months.

Since the last status conference, Plaintiff has been diligently seeking to obtain medical and employment records pertaining to Plaintiff's alleged damages. Plaintiff has contacted the relevant providers and anticipates producing these records on or before August 4. Once Plaintiff obtains and produces these medical and employment records, the parties will be ready to schedule depositions.

In light of the delay in procuring the necessary medical and employment records from nonparty medical providers and employers, the parties have been unable to comply with the current scheduling order, and respectfully request that they be permitted to submit for the Court's review a proposed revised scheduling order for the completion of discovery after these necessary records are received and produced by Plaintiff's counsel. Dated: July 17, 2023

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